

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Aman Kumar TURAN

Case: 2:22-mj-30308

Assigned To : Unassigned

Case No.

Assign. Date : 7/12/2022

Description: CMP USA v. TURAN (SO)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 11, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 841(a)

Possession with intent to distribute more than 65 kilograms of cocaine.

21 U.S.C. § 953(A)

Attempt to export more than 65 kilograms of cocaine,

This criminal complaint is based on these facts:

See attached Affidavit

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: July 12, 2022

City and state: Detroit, MI

Jeffrey D. Richardson
Complainant's signature

Special Agent Jeffrey Richardson, HSI
Printed name and title

Jonathan J.C. Grey
Judge's signature

Hon. Jonathan J.C. Grey, United States Magistrate Judge
Printed name and title

AFFIDAVIT

I, Jeffrey Richardson, being duly sworn, hereby state the following:

I. INTRODUCTION AND AGENT BACKGROUND

1. This affidavit is based on my own personal observations and knowledge as well as my review and analysis of oral and written reports, my discussions with other law enforcement officers, and my training and experience. The information outlined herein is provided for the limited purpose of establishing probable cause, and does not contain all details or facts that exist pertaining to the investigation.

2. I am a Special Agent and currently employed by the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) since April 2006. My formal education includes a Bachelor of Arts Degree in Criminal Justice from the University of Michigan-Flint. From April 2006 through September 2006 I attended the Federal Law Enforcement Training Center (FLETC) at Glynco, Georgia. During this time I received formalized training in various investigative techniques required of every Special Agent trainee. Following my successful completion of the FLETC training program, I was assigned to HSI's San Diego Field Office.

3. In June 2011, I was reassigned to the Financial Investigations Group. The Financial Investigations Group primarily investigates money laundering and bulk cash smuggling. In May 2012 I was reassigned to the Border Enforcement Security Task Force (BEST) Major Narcotics Group. The BEST Major Narcotics Group primarily conducts long term proactive narcotics investigations. I transferred to HSI's Detroit Field Office in January 2018 and was assigned to the BEST Narcotics Group.

4. Based on my investigation, there is probable cause to believe that Aman Kumar TURAN attempted to and did possess with intent to distribute more than 65 kilograms of cocaine in violation of Title 21 U.S.C. §§ 841(a) and attempted to export more than 65 kilograms of cocaine in violation of 21 U.S.C. §§ 953(A).

II. PROBABLE CAUSE

5. On July 11, 2022, Customs and Border Protection (CBP) officers were conducting outbound customs inspections at the Detroit Ambassador Bridge. CBP officers selected Aman Kumar TURAN, a citizen of India and resident of Canada, for inspection. TURAN was the driver and sole occupant of a Canadian commercial truck towing a Canadian registered commercial trailer. Prior to the search of the commercial trailer, CBP officers noticed the seal was not secured

properly to the door of the commercial trailer. CBP officers stated the seal was looped into the latch but never locked. CBP officers also noted the seal number was identical to the seal number listed on the Bill of Lading. A search of the commercial trailer resulted in the discovery of a white powdery substance which field-tested positive for the presence of cocaine. A CBP K-9 alerted to the suspected cocaine. CBP officers ultimately located and seized approximately 65.45 kilograms of suspected cocaine, which was found within the commercial trailer, just inside the doors, in black plastic garbage bags.

6. Following the seizure of the suspected cocaine, CBP officers reviewed the packaging material utilized to contain the suspected cocaine. After this review, CBP officers realized the seized suspected cocaine had been contained within black plastic garbage bags. CBP officers found a roll of similar, if not identical, empty black plastic garbage bags within the cab of TURAN's commercial truck. Located with the black plastic garbage bags was a receipt from Travel Centers of America for 30 gallon Glad trash bags and latex gloves.

7. Due to my training and experience, I estimate the value of the seized suspected cocaine to be approximately \$2,000,000. Your affiant is

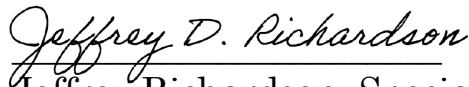
aware through his training and experience that this amount of cocaine is consistent with large scale drug distribution activities.

8. Post *Miranda*, TURAN stated he had been a commercial truck driver for six years. TURAN stated on July 10, 2022, he drove into the United States through Port Huron, MI and stopped at the Travel Centers of America in Battle Creek, MI and stayed the night. TURAN stated he bought a box of garbage bags from the Travel Centers of America on July 10, 2022. TURAN stated he travelled to his destination and dropped off the commercial cargo at approximately 8:00 a.m. on July 11, 2022. TURAN then stated he drove another two hours to pick up canned tomatoes.

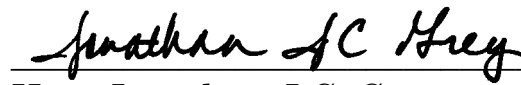
9. TURAN stated multiple times during the interview, he secured the doors with the seal before leaving with the canned tomatoes. TURAN stated he did not stop anywhere except for the weigh station. However, TURAN stated while on Interstate 75 near exit 14 or 15 in Michigan a person driving in the lane next to him claimed his commercial trailer doors were open. TURAN stated he exited Interstate 75 at exit 14 or 15 and checked the commercial trailer doors. TURAN stated the doors were secured and the seal was locked in place on the door.

10. I am aware that the utilization of seals on commercial trailers is commonplace in the trucking industry and most often is required by the shippers. Commercial truck drivers know how to install and secure seals on commercial trailers. TURAN has been a commercial truck driver since 2016 and has crossed into the U.S. approximately 150 times in the last four years.

11. Based on the foregoing, there is probable cause to believe that Aman Kumar TURAN violated 21 U.S.C. §§ 841(a) and 21 U.S.C. §§ 953(A).


Jeffrey Richardson, Special Agent
Department of Homeland Security,
Immigration and Customs
Enforcement, Homeland Security
Investigations

Sworn to before me and signed in my presence
And/or by reliable electronic means.


Hon. Jonathan J.C. Grey
United States Magistrate Judge

DATE: July 12, 2022